

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

Leila Green Little, et al.,

Plaintiffs,

v.

Llano County, et al.,

Defendants.

Case No. 1:22-cv-00424-RP

STIPULATION OF UNDISPUTED FACTS

1. Each of the seven plaintiffs attended the two-day preliminary-injunction hearing held on October 28, 2022, and October 31, 2022, and each of the seven plaintiffs heard Amber Milum and Tina Castelan testify at that hearing about the existence of the in-house checkout system at Llano Library.

2. Each of the plaintiffs is aware of Tina Castelan's testimony at the preliminary-injunction hearing, where she stated that in June 2021, Amber Milum told the librarians about a collection of books that had been donated to the library and were being kept on a shelf in the back. This collection is referred to as the in-house checkout system at Llano Library and it allows library patrons to check out books that do not appear on the library shelves or in the catalog. As of March 23, 2023, neither the in-house checkout system nor its contents are listed on the library's website or displayed publicly at Llano Library.

3. Each of the following 17 books is currently available for checkout through Llano Library's in-house checkout system:

- *They Called Themselves the K.K.K.: The Birth of an American Terrorist Group* by Susan Campbell Bartoletti

- *Gabi, a Girl in Pieces* by Isabel Quintero
- *Shine* by Lauren Myracle
- *Caste: The Origins of Our Discontents* by Isabel Wilkerson
- *It's Perfectly Normal: Changing Bodies, Growing Up, Sex, Gender, and Sexual Health* by Robie H. Harris
- *Being Jazz: My Life as a (Transgender) Teen* by Jazz Jennings
- *Spinning* by Tillie Walden
- *In the Night Kitchen* by Maurice Sendak
- *Freakboy* by Kristin Elizabeth Clark
- *My Butt is So Noisy!* by Dawn McMillan
- *I Broke My Butt!* by Dawn McMillan
- *I Need a New Butt* by Dawn McMillan
- *Larry the Farting Leprechaun* by Jane Bexley
- *Gary the Goose and His Gas on the Loose* by Jane Bexley
- *Freddie the Farting Snowman* by Jane Bexley
- *Harvey the Heart Has Too Many Farts* by Jane Bexley
- *Under the Moon: A Catwoman's Tale* by Lauren Myracle

4. Each of the plaintiffs is aware of Amber Milum's testimony at the preliminary-injunction hearing, where she stated that each of the 17 books listed in paragraph 3, with the sole exception of *Under the Moon: A Catwoman's Tale*, had been made available for checkout through the Llano Library's in-house checkout system.

5. Each of the plaintiffs is aware that Amber Milum has subsequently informed the Court that *Under the Moon: A Catwoman's Tale* is now available for checkout through the Llano Library's in-house checkout system along with the other 16 books listed in paragraph 3, effective November 1, 2022. *See* Third Milum Decl., ECF No. 100-5, at ¶ 6.

6. All of the 17 books listed in paragraph 3 were added to Llano Library's in-house checkout system between June 15, 2022, and October 31, 2022.

7. The plaintiffs do not dispute the existence of the Llano Library's in-house checkout system, and they do not dispute that the 17 books listed in paragraph 3 are included within Llano Library's in-house checkout system.

Respectfully submitted.

/s/ Ellen V. Leonida

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CERTIFICATE OF SERVICE

I certify that on March 23, 2023, I served this document through CM/ECF upon:

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